

# **EXHIBIT A**

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5 ERIKA LEE, PRO SE

6 UNITED STATES DISTRICT COURT

7 SOUTHERN DISTRICT OF NEW YORK

8  
9 -----X

10 ERIKA LEE

CASE:1:22-cv-08618-DEH-RWL

11  
12 Plaintiff, Pro Se

**PLAINTIFF'S SECOND  
AMENDED VERIFIED  
OBJECTIONS & RESPONSES  
TO DEFENDANT'S  
INTERROGATORIES(SET 1)**

13 -against  
14  
15 **DELTA AIR LINES, INC.,**  
16 **DAVID NEEDHAM & JOSE**  
17 **ROSADO**

18 Defendants

19  
20 -----X

**RESPONSE TO FEBRUARY 4, 2025 COURT ORDER**

21 PLAINTIFF IS NOT SUING FOR "PHYSICAL" INJURIES. ALSO, THE COURT DISMISSED  
22 PLAINTIFF'S NEGLIGENCE CLAIM.

23 1. The only medical provider from whom Plaintiff sought psychological treatment in  
24 connection with her claims in the instant action from January 13, 2017, to the present is "Dr.  
25 Mark Michaels at Premier Psychological, 5500 E Atherton St Long Beach, California 90815,  
26 (562) 212-6500 and Dr. Nimish Shah, 21520 Pioneer Blvd, #202, Hawaiian Gardens,  
CA, 98716. (562) 482-2811.

27 2.. (a)Plaintiff applied to jobs at Delta in 2021, but Plaintiff does not currently have  
any documents and communications relating to the applications for employment she has  
submitted to Delta from May 1, 2021, to the present.

28 (b) Plaintiff has not received any "income" from any other source since May 1, 2021.

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**AMENDED VERIFIED RESPONSES TO DELTA'S INTERROGATORIES**

1 it would cost to procure and produce these documents, and the parties can agree on the cost of  
 2 such a production.

3 47. Plaintiff objects to these interrogatories and/or Requests for Production because they are  
 4 so broad, uncertain, and unintelligible that the plaintiff cannot determine the nature of the  
 5 information sought. Therefore, plaintiff cannot provide an answer.

6 48. Plaintiff objects to these interrogatories and/or Requests for Production because they call  
 7 for pure conjecture and speculation.

8 49. Plaintiff objects to these interrogatories and/or Requests for Production because they call  
 9 for plaintiff to make a legal conclusion.

10 50. Plaintiff objects to these interrogatories and/or Requests for Production because they are  
 11 vague, ambiguous, argumentative, overbroad, unduly burdensome, and not reasonably  
 12 calculated to lead to the discovery of admissible evidence.

13 **PLAINTIFF'S AMENDED OBJECTIONS & RESPONSES TO DEFENDANT'S  
 14 INTERROGATORIES(SET 1)**

15 **DEFENDANT DELTA'S INTERROGATORY NO. 1:**

16 Identify each person who is known, or believed by you, to possess knowledge or  
 17 information that is or may be relevant to this Action, including any claims or defenses  
 18 asserted by the parties in the Action.

19 **PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S  
 20 INTERROGATORY NO. 1:**

21 In addition to the foregoing General Objections stated above and incorporated herein,  
 22 Plaintiff objects to this Request on the grounds that it is overbroad, unduly burdensome, and  
 23 seeks irrelevant information and Defendant is going on a fishing expedition. Plaintiff further  
 24 objects to this Request on the grounds that it is imprecise and/or lacking sufficient  
 25 particularity. Plaintiff further objects to this Request on the grounds that it is disproportional  
 26 to the needs of the case such that the burden and expense of responding outweigh the likely  
 27 benefit. Plaintiff further objects to this Request on the grounds that it seeks documents that  
 28 are not in Plaintiff's possession, custody and/or control. Plaintiff further objects to this  
 Request to the extent it seeks information protected by the attorney-client, attorney work  
 product and/or other applicable privileges. Defendant further objects to this Request on the  
 grounds that it is not reasonably limited in temporal scope. Plaintiff further object to this  
 Request on the grounds that it seeks confidential, proprietary, or business information about  
 Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks confidential  
 information regarding individuals who are not parties to this action, the disclosure of which  
 would violate the privacy interests of such individuals. Plaintiff further objects to this Request  
 on the grounds that it is vague, speculative, premature, conclusory, and ambiguous in its use  
 of the terms "Identify each person who is known, or believed by you, to possess knowledge  
 or information that is or may be relevant to this Action, including any claims or defenses  
 asserted by the parties in the Action," as Plaintiff already identified all individuals and  
 Defendants have not specifically listed, named, stated, articulated their affirmative defenses."

**AMENDED VERIFIED RESPONSES TO DELTA'S INTERROGATORIES**

1 Subject to and without waiving the foregoing General and specific objections, and subject to  
 2 a Protective Order that will be entered by the Court, Plaintiff lists Dr. Michael's and Dr.  
 3 Michael's office, Bernadette Tamasi, allegedly Jose Rosado, Ashely Rangel, Kelly Nabors,  
 4 Danielle Kruit, Mayra Amezquita(witness), "Dr. Mark Michaels at Premier Psychological,  
 5 5500 E Atherton St Long Beach, California 90815, (562) 212-6500 and Dr. Nimish Shah,  
 6 21520 Pioneer Blvd, #202, Hawaiian Gardens, CA, 98716. (562) 482-2811, perhaps Aasir  
 7 Azzarmi, perhaps unknown Doe Delta employees, Henrietta in EO and/or Delta EO  
 8 representatives in HR who Plaintiff made a complaint to on the approximate April 19, 2019  
 9 scheduled phone call. After a reasonable diligent search, no other individual have been found  
 10 that have not already been produced by Plaintiff to Defendant. Additionally,. Plaintiff further  
 11 objects to this request on the grounds that it is not reasonably limited in temporal or  
 12 geographic scope. Plaintiff further objects to this Interrogatory on the grounds that it calls for  
 13 a legal conclusion and for an answer that is outside the scope of appropriate factual inquiry.  
 14 Plaintiff further objects to this request to the extent it seeks information that is neither  
 15 relevant to the claims and defenses of this matter nor proportional to the needs of the case.  
 16 Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates  
 17 to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory  
 18 on the grounds that the Interrogatory seeks confidential information regarding individuals  
 19 who are not parties to this action, the disclosure of which would violate the privacy interests  
 20 of such individuals. Plaintiff further objects to this Interrogatory to the extent it seeks  
 21 information protected by the attorney-client, attorney work product and/or other applicable  
 22 privileges, and/or doctor-patient privilege.

#### **DEFENDANT DELTA'S INTERROGATORY NO. 2:**

Identify all facts supporting the allegations in your Complaint that Delta subjected you  
 to sexual harassment and/or a hostile work environment based on your sex and/or gender.

#### **PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S INTERROGATORY NO. 2:**

In addition to the foregoing General Objections stated above and incorporated herein,  
 Plaintiff objects to this Request on the grounds that it is overbroad, unduly burdensome, and  
 seeks irrelevant information. Plaintiff further objects to this Request on the grounds that it is  
 imprecise and/or lacking sufficient particularity. Plaintiff further objects to this Request on  
 the grounds that it is disproportional to the needs of the case such that the burden and expense  
 of responding outweigh the likely benefit. Plaintiff further objects to this Request on the  
 grounds that it seeks documents that are not in Plaintiff's possession, custody and/or control.  
 Plaintiff further objects to this Request to the extent it seeks information protected by the  
 attorney-client, attorney work product and/or other applicable privileges. Defendant further  
 objects to this Request on the grounds that it is not reasonably limited in temporal scope.  
 Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or  
 business information about Plaintiff. Plaintiff further objects to this Request on the grounds

#### **AMENDED VERIFIED RESPONSES TO DELTA'S INTERROGATORIES**

1 In addition to the foregoing General Objections stated above and incorporated herein,  
 2 Plaintiff objects to this Request on the grounds that it is overbroad, unduly burdensome, and  
 3 seeks irrelevant information. Plaintiff further objects to this Request on the grounds that it is  
 4 imprecise and/or lacking sufficient particularity and damages are continual in nature and  
 5 unable to be completely ascertained at this time. Plaintiff further objects to this Request on  
 6 the grounds that it is disproportional to the needs of the case such that the burden and expense  
 7 of responding outweigh the likely benefit. Plaintiff further objects to this Request on the  
 8 grounds that it seeks documents that are not in Plaintiff's possession, custody and/or control,  
 9 but that are in the possession of Defendant and equally available to Defendant. Plaintiff  
 10 further objects to this Request to the extent it seeks information protected by the attorney-  
 11 client, attorney work product and/or other applicable privileges. Plaintiff further objects to  
 12 this Request on the grounds that it is not reasonably limited in temporal scope. Plaintiff  
 13 further object to this Request on the grounds that it seeks confidential, proprietary, or business  
 14 information about Plaintiff. Plaintiff further objects to this Request on the grounds that it  
 15 seeks confidential information regarding individuals who are not parties to this action, the  
 16 disclosure of which would violate the privacy interests of such individuals. Plaintiff further  
 17 objects to this Request on the grounds that it is vague, speculative, premature, conclusory, and  
 18 ambiguous in its use of the terms "With respect to the relief you seek in your Complaint,  
 19 provide the following information: a. b. c. The types and amounts of all monetary recoveries  
 20 you are seeking; The manner in which you calculated such claimed entitlements to relief;  
 21 Identify each document that supports, relates, or refers in any way to your requests for relief,  
 22 or upon which you have relied in calculating your requested relief," as Defendant is requesting  
 23 Plaintiff provide legal conclusions. Subject to and without waiving the foregoing General and  
 24 specific objections, and subject to a Protective Order that will be entered by the Court,  
 Plaintiff will not respond. Plaintiff further objects to this Interrogatory on the grounds that it  
 calls for a legal conclusion and for an answer that is outside the scope of appropriate factual  
 inquiry. Plaintiff further objects to this request to the extent it seeks information that is neither  
 relevant to the claims and defenses of this matter nor proportional to the needs of the case.  
 Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates  
 to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory  
 on the grounds that the Interrogatory seeks confidential information regarding individuals  
 who are not parties to this action, the disclosure of which would violate the privacy interests  
 of such individuals. Plaintiff further objects to this Interrogatory to the extent it seeks  
 information protected by the attorney-client, attorney work product and/or other applicable  
 privileges, and/or doctor-patient privilege.

25  
**DEFENDANT DELTA'S INTERROGATORY NO. 12:**

26 Identify each person from whom you have obtained, will obtain, or sought to obtain  
 27 a written statement concerning the facts of this Action and identify each written statement.

1 **PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S**  
 2 **INTERROGATORY NO. 12:**

3 In addition to the foregoing General Objections stated above and incorporated  
 4 herein, Plaintiff objects to this Request on the grounds that it is overbroad, unduly  
 5 burdensome, and seeks irrelevant information. Plaintiff further objects to this Request on the  
 6 grounds that it is imprecise and/or lacking sufficient particularity. Plaintiff further objects to  
 7 this Request on the grounds that it is disproportional to the needs of the case such that the  
 8 burden and expense of responding outweigh the likely benefit. Plaintiff further objects to this  
 9 Request on the grounds that it seeks documents that are not in Plaintiff's possession, custody  
 10 and/or control. Plaintiff further objects to this Request to the extent it seeks information  
 11 protected by the attorney-client, attorney work product and/or other applicable privileges.  
 12 Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or  
 13 business information about Plaintiff. Plaintiff further objects to this Request on the grounds  
 14 that it seeks confidential information regarding individuals who are not parties to this action,  
 15 the disclosure of which would violate the privacy interests of such individuals. Plaintiff  
 16 further objects to this Request on the grounds that it is vague, speculative, premature,  
 17 conclusory, and ambiguous in its use of the terms "Identify each person from whom you have  
 18 obtained, will obtain, or sought to obtain a written statement concerning the facts of this  
 19 Action and identify each written statement," as Plaintiff can not speculate about what Plaintiff  
 20 "will" do in the future. Plaintiff further objects since Defendant alleges to be aware of and/or  
 21 is already in possession of any of all of the current statements from third parties. Subject to  
 22 and without waiving the foregoing General and specific objections, and subject to a  
 23 Protective Order that will be entered by the Court, Plaintiff responds: Dr. Michael's and Dr.  
 24 Michael's office, Bernadette Tamasi, allegedly Jose Rosado, Ashely Rangel, Kelly Nabors,  
 25 Danielle Kruit, Mayra Amezquita(witness), Delta EO representative in HR who Plaintiff  
 made a complaint to on the approximate April 19, 2019 scheduled phone call. Plaintiff  
 received a previous statement from Mayra Amezquita, "Dr. Mark Michaels at Premier  
 Psychological, 5500 E Atherton St Long Beach, California 90815, (562) 212-6500 and Dr.  
 Nimish Shah, 21520 Pioneer Blvd, #202, Hawaiian Gardens, CA, 98716. (562) 482-2811,  
 Henrietta in Delta EO, perhaps Aasir Azzarmi, perhaps currently unknown Doe Delta  
 employees. Plaintiff further objects to this Interrogatory on the grounds that it calls for a legal  
 conclusion and for an answer that is outside the scope of appropriate factual inquiry. Plaintiff  
 further objects to this request to the extent it seeks information that is neither relevant to the  
 claims and defenses of this matter nor proportional to the needs of the case. Plaintiff further  
 objects to this Request on the grounds that it is irrelevant insofar as it relates to claims in this  
 Action that have been dismissed. Plaintiff further objects to this Interrogatory on the grounds  
 that the Interrogatory seeks confidential information regarding individuals who are not parties  
 to this action, the disclosure of which would violate the privacy interests of such individuals.  
 Plaintiff further objects to this Interrogatory to the extent it seeks information protected by the  
 attorney-client, attorney work product and/or other applicable privileges, and/or doctor-  
 patient privilege.

1 of responding outweigh the likely benefit. Plaintiff further objects to this Request on the  
 2 grounds that it seeks documents that are not in Plaintiff's possession, custody and/or control.  
 3 Plaintiff further objects to this Request to the extent it seeks information protected by the  
 4 attorney-client, attorney work product and/or other applicable privileges. Plaintiff further  
 5 object to this Request on the grounds that it seeks confidential, proprietary, or business  
 6 information about Plaintiff. Plaintiff further objects to this Request on the grounds that it  
 7 seeks confidential information regarding individuals who are not parties to this action, the  
 8 disclosure of which would violate the privacy interests of such individuals. Plaintiff further  
 9 objects to this Request on the grounds that it is vague, speculative, premature, conclusory, and  
 10 ambiguous in its use of the terms "Identify any lawsuits (other than this lawsuit), claims,  
 11 grievances, administrative actions, or charges brought by or against you or on your behalf or  
 12 in which you testified, including, but not limited to, any criminal proceedings, bankruptcy  
 13 proceedings, administrative proceedings or appeals, claims for workers' compensation or  
 14 unemployment compensation, or other claims against any other person or entity. In your  
 15 answer, please identify each, the name and location of the court, agency, or tribunal; the  
 16 charge, case, file, or court file number; the date on which the administrative or legal  
 17 proceedings commenced; the names and addresses of each party and their attorneys, and any  
 18 designation of whether the party was a plaintiff, defendant, respondent, accused, victim, or  
 19 other role; the nature of the charge, report, complaint, and/or defense; the present status; and  
 20 if concluded, the final result, and the amount of any settlement or award," as this is an  
 21 invasion of privacy and violation of Plaintiff's HIPAA rights. Subject to and without waiving  
 22 the foregoing General and specific objections, and subject to a Protective Order that will be  
 23 entered by the Court, Plaintiff responds that Plaintiff will not respond. Plaintiff further  
 24 responds that Plaintiff is not aware of any at the moment which Plaintiff can name, besides 1  
 25 lawsuit in California against Delta Air Lines, which Delta is already aware of and which  
 26 Delta filed a motion to dismiss for res judicata. Plaintiff further objects to this Interrogatory  
 on the grounds that it calls for a legal conclusion and for an answer that is outside the scope  
 of appropriate factual inquiry. Plaintiff further objects to this request to the extent it seeks  
 information that is neither relevant to the claims and defenses of this matter nor proportional  
 to the needs of the case. Plaintiff further objects to this Request on the grounds that it is  
 irrelevant insofar as it relates to claims in this Action that have been dismissed. Plaintiff  
 further objects to this Interrogatory on the grounds that the Interrogatory seeks confidential  
 information regarding Plaintiff and individuals who are not parties to this action, the  
 disclosure of which would violate the privacy interests of such individuals, including  
 Plaintiff. Plaintiff further objects to this Interrogatory to the extent it seeks information  
 protected by the attorney-client, attorney work product and/or other applicable privileges,  
 and/or doctor-patient privilege.

27 **DEFENDANT DELTA'S INTERROGATORY NO. 19:**  
 28 Identify all persons who you believe you may call as a witness in the trial of this  
 Action.

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**AMENDED VERIFIED RESPONSES TO DELTA'S INTERROGATORIES**

1 **PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S  
2 INTERROGATORY NO. 19:**

3 In addition to the foregoing General Objections stated above and incorporated herein,  
4 Plaintiff objects to this Request on the grounds that it is overbroad, speculative, unduly  
5 burdensome, and seeks irrelevant information. Plaintiff further objects to this Request on the  
6 grounds that it is imprecise and/or lacking sufficient particularity. Plaintiff further objects to  
7 this Request on the grounds that it is disproportional to the needs of the case such that the  
8 burden and expense of responding outweigh the likely benefit. Plaintiff further objects to this  
9 Request on the grounds that it seeks documents that are not in Plaintiff's possession, custody  
10 and/or control. Plaintiff further objects to this Request to the extent it seeks information  
11 protected by the attorney-client, attorney work product and/or other applicable privileges.  
12 Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or  
13 business information about Plaintiff. Plaintiff further objects to this Request on the grounds  
14 that it seeks confidential information regarding individuals who are not parties to this action,  
15 the disclosure of which would violate the privacy interests of such individuals. Plaintiff  
16 further objects to this Request on the grounds that it is vague, speculative, premature,  
17 conclusory, and ambiguous in its use of the terms "Identify all persons who you believe you  
18 may call as a witness in the trial of this Action," as this is speculative, as Plaintiff does not  
19 know what or who Plaintiff will call as a witness in the trial of this action. Subject to and  
20 without waiving the foregoing General and specific objections, and subject to a Protective  
21 Order that will be entered by the Court, Plaintiff responds that all of the individuals named in  
22 the complaint may be called as a witness to trial. Plaintiff responds: Dr. Michael's and Dr.  
23 Michael's office, Bernadette Tamasi, allegedly Jose Rosado, Ashely Rangel, Kelly Nabors,  
24 Danielle Kruit, Mayra Amezquita(witness), Henrietta in Delta's EO department and/or the  
25 Delta EO representative in HR who Plaintiff made a complaint to on the approximate April  
26 19, 2019 scheduled phone call, perhaps Aasir Azzarmi, perhaps unknown Doe Delta  
27 employees, and/or Doe Delta passengers. Plaintiff further objects to this Interrogatory on the  
28 grounds that it calls for a legal conclusion and for an answer that is outside the scope of  
appropriate factual inquiry. Plaintiff further objects to this request to the extent it seeks  
information that is neither relevant to the claims and defenses of this matter nor proportional  
to the needs of the case. Plaintiff further objects to this Request on the grounds that it is  
irrelevant insofar as it relates to claims in this Action that have been dismissed. Plaintiff  
further objects to this Interrogatory on the grounds that the Interrogatory seeks confidential  
information regarding Plaintiff and individuals who are not parties to this action, the  
disclosure of which would violate the privacy interests of such individuals, including  
Plaintiff. Plaintiff further objects to this Interrogatory to the extent it seeks information  
protected by the attorney-client, attorney work product and/or other applicable privileges,  
and/or doctor-patient privilege.

28 **DEFENDANT DELTA'S INTERROGATORY NO. 20:**

Identify each expert who you believe you may call to testify at trial in this lawsuit.   

**AMENDED VERIFIED RESPONSES TO DELTA'S INTERROGATORIES**

1 **PLAINTIFF'S OBJECTIONS & RESPONSES TO DEFENDANT DELTA'S  
INTERROGATORY NO. 20:**

2 In addition to the foregoing General Objections stated above and incorporated herein,  
 3 Plaintiff objects to this Request on the grounds that it is overbroad, speculative, unduly  
 4 burdensome, and seeks irrelevant information. Plaintiff further objects to this Request on the  
 5 grounds that it is imprecise and/or lacking sufficient particularity. Plaintiff further objects to  
 6 this Request on the grounds that it is disproportional to the needs of the case such that the  
 7 burden and expense of responding outweigh the likely benefit. Plaintiff further objects to this  
 8 Request on the grounds that it seeks documents that are not in Plaintiff's possession, custody  
 9 and/or control. Plaintiff further objects to this Request to the extent it seeks information  
 10 protected by the attorney-client, attorney work product and/or other applicable privileges.  
 11 Plaintiff further object to this Request on the grounds that it seeks confidential, proprietary, or  
 12 business information about Plaintiff. Plaintiff further objects to this Request on the grounds  
 13 that it seeks confidential information regarding individuals who are not parties to this action,  
 14 the disclosure of which would violate the privacy interests of such individuals. Plaintiff  
 15 further objects to this Request on the grounds that it is vague, speculative, premature,  
 16 conclusory, and ambiguous in its use of the terms "Identify each expert who you believe you  
 17 may call to testify at trial in this lawsuit." as this is speculative, as Plaintiff does not know  
 18 what or who Plaintiff will call as a witness in the trial of this action. Subject to and without  
 19 waiving the foregoing General and specific objections, and subject to a Protective Order that  
 20 will be entered by the Court, Plaintiff responds that all of the individuals named in the  
 21 complaint may be called as a witness to trial, and at this time Plaintiff does not believe she  
 22 will have any experts. Plaintiff further objects to this Interrogatory on the grounds that it calls  
 23 for a legal conclusion and for an answer that is outside the scope of appropriate factual  
 24 inquiry. Plaintiff further objects to this request to the extent it seeks information that is neither  
 25 relevant to the claims and defenses of this matter nor proportional to the needs of the case.  
 26 Plaintiff further objects to this Request on the grounds that it is irrelevant insofar as it relates  
 27 to claims in this Action that have been dismissed. Plaintiff further objects to this Interrogatory  
 28 on the grounds that the Interrogatory seeks confidential information regarding Plaintiff and  
 individuals who are not parties to this action, the disclosure of which would violate the  
 privacy interests of such individuals, including Plaintiff. Plaintiff further objects to this  
 Interrogatory to the extent it seeks information protected by the attorney-client, attorney work  
 product and/or other applicable privileges, and/or doctor-patient privilege.

"I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and  
 correct. Executed on 2/10/2025.

Date: 2/10/2025 \_\_\_\_\_/s/\_\_\_\_\_

ERIKA L. LEE, the PLAINTIFF(proceeding as PRO SE)